

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON**

UNITED STATES OF AMERICA

v.

**INDIVIOR INC. (a/k/a Reckitt Benckiser
Pharmaceuticals Inc.) and
INDIVIOR PLC**

Case No. 1:19-CR-00016

MOTION TO SEAL

The United States of America (“United States”) hereby moves for an order sealing its Motion for Conflict of Interest Inquiry (submitted to the Court this same day) (“Motion”) until further order of the Court, for the following reason. In the Motion, for the sole purpose of providing the Court with sufficient information to conduct a conflicts inquiry, the United States describes certain arguments defense counsel articulated in pre-indictment discussions and negotiations. Defense counsel may wish to seek to have these discussions kept confidential. Accordingly, the United States asks that the Motion be filed under seal to allow defense counsel an opportunity to notify the Court of their reasons, if any, for the Motion to remain under seal.

Respectfully submitted,

DANIEL P. BUBAR
Attorney for the United States, Acting Under
Authority Conferred by 28 U.S.C. § 515

/s/ Albert P. Mayer, VSB No. 86024
Carol L. Wallack
Garth W. Huston
Randy Ramseyer
Kristin L. Gray
Joseph S. Hall
Janine M. Myatt
United States Attorney’s Office
180 West Main Street
Abingdon, VA 24210

Tel: (276) 628-4161
Fax: (276) 628-7399
Email: USAVAW.ECFAbingdon@usdoj.gov

CERTIFICATE OF SERVICE

I certify that on June 19, 2019, I electronically filed the foregoing Motion to Seal with the Clerk of Court via the CM/ECF system, which will send notification of the filing to all counsel of record in this matter.

/s/ Albert P. Mayer, VSB No. 86024